



Miedel & Mysliwiec LLP

January 5, 2023

Hon. Katherine Polk Failla
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: United States v. Edwin Vasquez, 13-CR-869

Dear Judge Failla:

On December 1, 2022, Your Honor appointed me to assist Mr. Vasquez in filing a renewed motion for compassionate release pursuant to 18 U.S.C. § 3582. It directed the parties to confer and to propose a briefing schedule.

Since that date, I have conferred with the government and have obtained some, though not all, updated medical records for Mr. Vasquez. I have also made concerted efforts to have a legal call with Mr. Vasquez through his counselor at his BOP facility, but for inscrutable reasons, that call has not yet taken place.

In light of my ongoing efforts to obtain the necessary information for a compassionate release motion, I propose a deadline for such motion 30 days from today. The government requests three weeks to respond. If I receive what I need in short order, I hope to file the motion before February 3, and I would request that the government respond within three weeks after the date of filing.

Thank you for your consideration.

Respectfully,

/s/

Florian Miedel
Attorney for Edwin Vasquez

cc: AUSA Jeffrey Coyle

Application GRANTED. Defendant shall file his compassionate release motion on or before **February 6, 2023**. The Government shall file its response by **February 27, 2023**.

The Clerk of Court is directed to terminate the pending motion at docket entry 91.

Dated: January 5, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE